UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

FEB 29 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply to: OCE-101

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

NOTICE OF VIOLATION

Mr. Clayton Steele
Environmental Manager
Clearwater Paper Corporation
803 Mill Road
Lewiston, Idaho 83648

Re: Clearwater Paper Corporation
NPDES Identifier Number IDR05C050 & ID-000116-3

Dear Mr. Steele:

On June 23, 2015, the U.S. Environmental Protection Agency (EPA) inspected Clearwater Paper Corporation ("Facility") located at 803 Mill Road, Lewiston, Idaho 83648. The inspection was conducted to assess the Facility's compliance with the Clean Water Act (CWA), NPDES Permit Number ID-000116-3 ("Permit"), and Multi-Sector General Permit Number IDR05C050 (MSGP) for storm water discharges as a Pulp Mill Facility (Sector B2). At the time of the inspection, the inspector did not note any areas of concern regarding the MSGP. All violations and areas of concern in this letter are for the NPDES Permit that was administratively extended on April 30, 2010. I would like to express my appreciation for your staff's time and cooperation during the inspection.

REVIEW OF ADMINISTRATIVE FILES

Part III.B.4 of the Permit specifies that the permittee must summarize monitoring results each month on the DMR form (EPA No. 3320-1) or equivalent. The permittee must submit these reports monthly, postmarked by the 20th day of the following month.

During the EPA review of DMR data from February 2011 to February 2016, it was identified that the Facility submitted one late DMR. The June 2014 DMR was received on February 27, 2015. This is a violation of Part III.B.4. On December 21, 2015, the NPDES Electronic Reporting Rule became effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR. Additional information is enclosed (Enclosure A).

JUNE 2015 INSPECTION

AREAS OF CONCERN

1. Part III.A.1 of the Permit specifies that the permittee must ensure that samples and measurements taken for the purpose of monitoring are representative of the monitored activity. Part IV.E of the

Permit specifies that the permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit.

At the time of the inspection, the Facility said it was unable to calibrate the flow meter so it is unclear whether measurements from the flow meter would be representative of the effluent flow.

2. Part I.F.3.c.13 of the Permit specifies that the permittee must collect samples as follows: fill the 500-milliliter glass jar approximately 3/4 full and use the pH meter or pH paper to measure the pH. Use a temperature probe or thermometer to measure the temperature of the sample. Record this information on the field data sheet and discard the sample into a sump. The sample should also measure and record the pH and temperature of the final composite sample. Part III.C of the Permit states that the permittee must conduct monitoring according to test procedures approved under 40 CFR 136, unless other test procedures have been specified in this permit. Table II of 40 CFR 136.3 states that the pH must be analyzed within 15 minutes of sample collection

   At the time of the inspection, the Facility stated that the pH was tested in the laboratory rather than at the time of collection. This could cause the sample to be analyzed outside of the 15 minute analysis window.

VIOLATION

Part I.F.3.b.1 of the Permit specifies that the permittee must utilize the following sample collection methods for Bleach Plant Wastewater: a sample cooling system, consisting of Teflon® tubing attached to a valve at one end and coiled and placed in a tub of ice and water at the other.

At the time of the inspection, the Facility said that bleach plant wastewater was collected through steel tubing. This is a violation of Part I.F.3.b.1 of the Permit.

Although our goal is to ensure NPDES facilities comply fully with their permits, the ultimate responsibility rests with the permittee. As such, I want to strongly encourage you to continue your efforts to maintain full knowledge of the Permit requirements, and other appropriate statutes, and to take appropriate measures to ensure compliance. Notwithstanding your response to this letter, EPA retains all rights to pursue enforcement actions to address these and any other violations.

I have enclosed a copy of the inspection report (Enclosure B). If you have any questions concerning this matter, please do not hesitate to contact Raymond Andrews of my staff at (206) 553-4252.

Sincerely,

Edward J. Kowalski
Director

Enclosures

cc: Mr. Stephen Berry
Idaho Department of Environmental Quality
stephen.berry@deq.idaho.gov

Mr. John Cardwell
Idaho Department of Environmental Quality
Lewiston Regional Office
john.cardwell@deq.idaho.gov

Mr. Bill Hoesman
Clearwater Paper Corporation
Senior Environmental Engineer
bill.hoesman@clearwaterpaper.com

Enclosure A
NetDMR Fact Sheet

NetDMR: Electronic NPDES Reporting

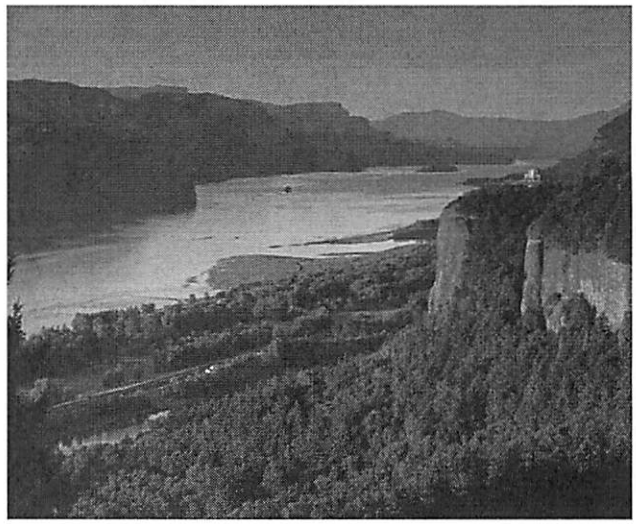
United States Environmental Protection Agency

Compliance is Required

Region 10, Seattle WA

November 2015

On October 22, 2015, EPA published the Clean Water Act National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, which requires electronic reporting of NPDES information from permitted facilities. **As of December 21, 2015 this rule becomes effective. Permittees with a DMR requirement will have one year from this date to submit DMRs through NetDMR.** The final NPDES eRule will save time and resources for permittees, states, tribes, territories, and the U.S. Government while increasing data accuracy, improving compliance, and supporting EPA's goal of providing better protection of the nation's waters.



Columbia River

What is NetDMR?

NetDMR is a web application that can be used to enter and submit data required to meet NPDES permit reporting requirements. The Agency (State, Region, Tribal Nation, or EPA headquarters) that issued and manages your permit can tell you how you can report using NetDMR.

- It creates a signed digital document and eliminates paper data entry. The result is improved data quality and availability, increased consistency of data, and speeds up the DMR process.
- NetDMR was made available to the states on June 22nd, 2009; Region 10 (WA, OR, AK, ID) implementation began on July of 2009. Since that time approximately 100 permittees have enrolled in NetDMR or about 25% of the 400 permittees overseen by the EPA in Region 10 with a DMR requirement.

How Do I Learn More?

To learn more please visit the NetDMR support site https://netdmr.zendesk.com/home. Under the Knowledge Base tab at the top of the screen there are user guides and documents to help get you started.

Or contact the Region 10 NetDMR team:

- Region 10 NetDMR Email Address: R10NetDMR@epa.gov
- Jason Rodriguez: 206-553-8508 rodriguez.jason@epa.gov
- Sharon Eng: 206-553-0705 eng.sharon@epa.gov

Enclosure B
June 23, 2015 EPA Inspection Report

NPDES Inspection Report

Permit # ID0001163 & IDR05C050

Clearwater Paper Corporation

Lewiston, ID

June 23, 2015

Prepared by:

Matt Vojik
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement (OCE)
Inspection and Enforcement Management Unit (IEMU)

Contents

I. Facility Information

Facility Name:	Clearwater Paper Corporation
Facility Owner/Operator:	Clearwater Paper Corporation
Facility Address:	803 Mill Road, Lewiston, ID 83501
Mailing Address:	803 Mill Road, P.O. Box 1126, Lewiston, ID 83501-1126
Lat/Long:	46.424040°, -116.970060°
NPDES Permit:	ID0001163 & IDR05C050
Receiving Water:	Clearwater and Snake Rivers
NAICS Code:	322110 – Pulp Mills 322121 – Paper (Except Newsprint) Mills
Facility Contacts:	Clayton E. Steele, Environmental Manager Phone: 208-799-4144 Fax: 208-799-1788 Cell: 208-791-7641 Email: Clayton.steele@clearwaterpaper.com Bill Hoesman, Senior Environmental Engineer Phone: 208-799-1585 Fax: 208-799-1788 Cell: 208-413-3218 Email: Bill.hoesman@clearwaterpaper.com

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Bill Hoesman or from observations during the inspection.)

II. Inspection Information

Inspection Date:	June 23, 2015
Inspectors:	Matt Vojik, Inspector EPA Region 10, OCE / IEMU Phone: 206-553-0716
Arrival Time:	6:30 AM
Departure Time:	11:45 AM

Weather:	Sunny
Purpose:	To determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES).

III. Permit Information

This facility is permitted under NPDES permit ID0001163. The permit became effective on May 1, 2005 and has been administratively extended since the expiration date of April 30, 2010. The facility also obtained coverage under the Multi-Sector General Permit (MSGP) for stormwater discharges on April 23, 2009 under the permit tracking number IDR05C050. At the time of the inspection, the MSGP had been administratively extended since the expiration date of September 29, 2013.

According to Enforcement and Compliance History Online (ECHO), the EPA last inspected the facility under both permits on May 9, 2013.

IV. Background

Under the previous ownership of the Potlatch Corporation, the facility began operating as a lumber mill in 1927 and added a pulp and paper mill in 1950. The facility operated under the name Potlatch Forest Products Corporation until 2008, when the Potlatch Corporation completed a spin-off of its pulp-based businesses into the Clearwater Paper Corporation (CPC). In 2011, the sawmill portion of the facility was sold to the Idaho Forest Group. This facility currently consists of an integrated pulp mill that encompasses approximately 600 acres. CPC employs approximately 1,000 people at this location and produces bleached grades of paperboard, tissue, and market pulp by the kraft (sulfate) process.

The process wastewater collection system consists of an acid sewer, which receives flow from the bleach plant and an alkaline sewer, which receives flow from the pulp mill, paper machines, evaporators, recovery boilers, caustic plant and consumer products division. The alkaline sewer flows to a primary clarifier, which removes suspended solids. Effluent from the primary clarifier enters a mix basin, where it combines with effluent from the acid sewer before entering the aerated stabilization basin (ASB).

The ASB was built in the 1970s and covers more than 100 acres with a volume of approximately 350 million gallons. In addition to mix basin effluent, the ASB receives stormwater, foul condensate, power plant effluent and leachate from a closed onsite wood waste landfill. A sewer flow schematic diagram appears in **Attachment A**. Facility processes have been documented in further detail in the report for a multi-media inspection conducted by the National Enforcement Investigations Center (NEIC) in 2009.

The ASB discharges to the Snake River through a submerged diffuser at outfall 001, which is located four miles west of the facility at the confluence of the Snake and Clearwater Rivers. The ASB also discharges via seepage to the Clearwater River.

V. Inspection Entry

This was an announced inspection. On June 19, 2015, I called Mr. Hoesman (pronounced "hessman") and made arrangements to meet on the day of the inspection. I arrived at the facility at 6:30am and presented my credentials to Mr. Hoesman, who accompanied me throughout the inspection. I was not denied access to the facility.

VI. Inspection Chronology

I began the inspection with a brief opening conference and proceeded to observe effluent sampling, which occurs daily at 7:00am. I took a tour of the facility and performed a records review. I provided Mr. Hoesman with an EPA Small Business Resources Information Sheet. I also inspected the facility for compliance with the multi-sector general permit, tracking number IDR05C050, which is documented in a separate report. I ended with a closing conference to discuss observations and next steps.

VII. Records Review

I conducted a cursory review of the following records. As described below, the facility provided electronic copies of some records, which have been saved to the CD in **Attachment C**.

- **Discharge Monitoring Reports (DMRs)** – During the inspection, Mr. Hoesman showed me the facility's electronic record-keeping database for maintaining DMRs, analytical records and chain of custody forms. Example discharge monitoring records for the month of May 2015 are saved to the CD in **Attachment C**.

- **Quality Assurance Plan (QAP)** – Mr. Hoesman presented a copy of the QAP, which was dated May 2015. He explained that the facility follows additional standard operating procedures, which are frequently reviewed and updated. An electronic copy of the QAP is saved to the CD in **Attachment C**.

- **Best Management Practices Plan (BMP)** – Mr. Hoesman presented a copy of the BMP Plan, which was dated May 2015. He explained that the facility conducts an annual BMP training on-line every January. Mr. Hoesman said that three wastewater operators conduct daily visual inspections and inspection records are kept at the pulp mill.

- **Stormwater Pollution Prevention Plan (SWPPP)** – Mr. Hoesman presented a copy of the SWPPP, which was dated May 2015. Mr. Hoesman explained that the facility's stormwater outfalls have been decommissioned and rerouted so that industrial stormwater

evaporates, infiltrates or flows to the ASB for treatment and discharge under NPDES permit ID0001163. Although the facility no longer maintains stormwater outfalls, Mr. Hoesman said that CPC has decided to retain coverage under the MSGP.

VIII. Facility Inspection

Mr. Hoesman took me on a tour of the facility. A site map, flow schematic and aerial image appear in **Attachment A**. A photograph log appears in **Attachment B**.

I inspected the mix basin (**Photo 1**) and ASB (**Photo 2**), which was equipped with 22 aerators. I also inspected the on-site laboratory and observed the collection of samples of mix basin influent, ASB effluent (**Photo 3**) and bleach plant effluent (**Photo 4**).

Mr. Hoesman explained that certain parameters, such as nutrients, adsorbable organic halides (AOX) are analyzed by the ALS Environmental laboratory in Kelso, WA. Tetrachlorodibenzodioxin (TCDD, EPA Method 1613) analysis is conducted at the ALS laboratory in Houston, TX.

I also visited the location of the last of the stormwater outfalls to be decommissioned. According to Mr. Hoesman, stormwater outfall 007 has been replaced by a sump (**Photo 6**) located along the southwestern berm of the ASB.

IX. Areas of Concern

I noted the following areas of concern:

A. Accuracy of Effluent Flow Measurements

Table 1 of Section I.B.4. of the permit specifies that the permittee is required to record effluent flow continuously.
AND
Section III.A.1. of the permit states that "the permittee must ensure that samples and measurements taken for the purpose of monitoring are representative of the monitored activity."

Mr. Hoesman explained that the facility measures effluent flow with a magnetic flow meter that is 20 years old. He said that the facility is unable to calibrate the flow meter, so it was unclear whether measurements from this meter would be representative of effluent flow.

Mr. Hoesman further explained that the facility cross-checks effluent flow data with upstream flow measurements. Because upstream flows come from various sources (including process wastewater sewers, foul condensate, power plant effluent, landfill leachate and stormwater), it was unclear whether the facility's upstream flow data be could be accurately correlated to effluent flow.

B. Sample Collection Method for Bleach Plant Wastewater

Section I.F.3.b.(1) of the permit states that samples of bleach plant wastewater should be collected through "a sample cooling system, consisting of Teflon® tubing attached to a valve at one end and coiled and placed in a tub of ice and water at the other."

During the inspection, Mr. Hoesman said that the facility collects bleach plant wastewater samples (**Photo 4**) through steel tubing (**Photo 5**), because steel tubing performs better than Teflon® tubing specified in the permit.

C. Holding Time for pH Analysis of Bleach Plant Effluent

Section I.F.3.c.(13) of the permit includes instructions for measuring the temperature and pH of bleach plant wastewater samples in the field.
AND
Section III.C. of the permit states that "the permittee must conduct monitoring according to test procedures approved under 40 CFR 136," which specifies a 15 minute holding time for pH analysis.

During the collection of bleach plant wastewater samples (**Photo 4**), I observed that the facility measured temperature, but not pH in the field. Mr. Hoesman said that the facility measures pH in the lab. Because each bleach plant sampling event calls for multiple sample containers and multiple sample locations, it is unlikely that the facility would be able to return to the laboratory and complete pH analysis within the 15 minute holding time specified under 40 CFR 136.

X. Closing Conference

I held a closing conference with Mr. Hoesman and Mr. Clayton Steele. We discussed the areas of concern identified during the inspection and I gave a brief overview of the post-inspection process. I thanked them for their time and assistance.

Report Completion Date: January 12, 2016

Lead Inspector Signature: _____

ATTACHMENT A – Vicinity Map, Site Plan, Flow Schematic & Aerial Image

Aerial Image Obtained from Google Earth

ATTACHMENT B – Photograph Log

Photo 1 / P1010795 – Southeasterly view of the aerated stabilization basin

Photo 2 / P1010798 – Westerly view of the mix basin

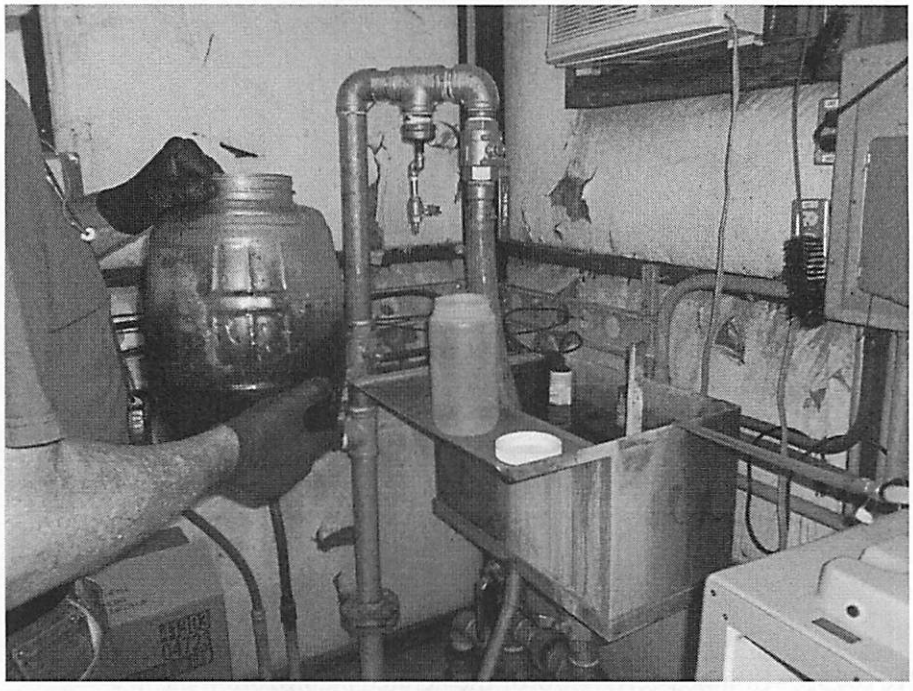


Photo 3 / P1010791 – Final effluent composite sample

Photo 4 / P1010814 – Sample collection at sampling point 021A, which represents process wastewater from the bleach plant's acid bleaching stage

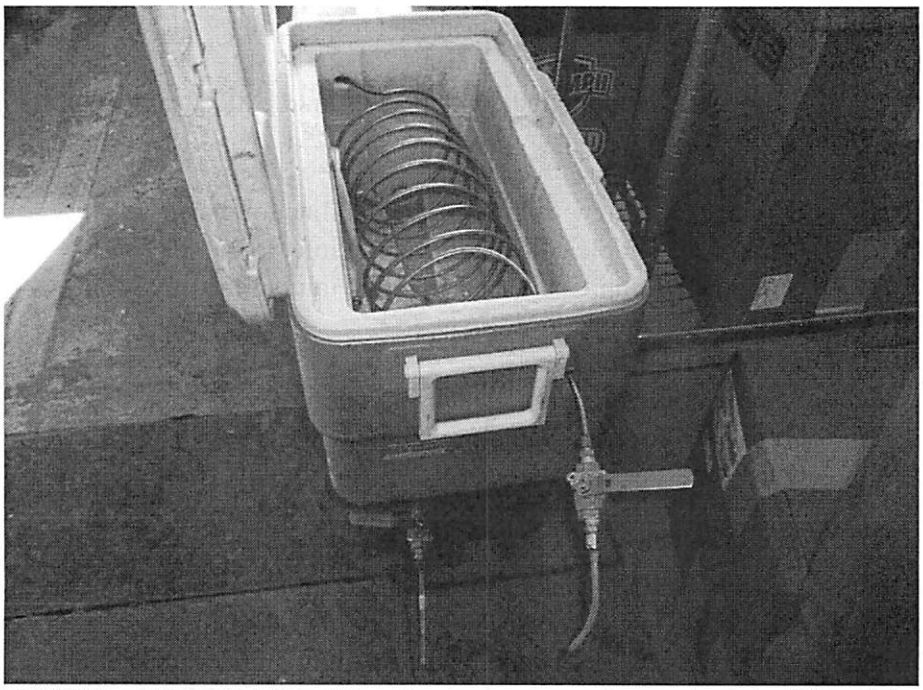


Photo 5 / P1010801 – View inside a chloroform sample cooler equipped with stainless steel tubing

Photo 6 / P1010807 – Northerly view of the sump that replaced stormwater outfall 007

Photographer: Matt Vojik
Camera Model: Panasonic DMC-FH25

CPC – ID0001163 & IDR05C050
NPDES Inspection – June 23, 2015

Description of additional photographs taken during the inspection:

- P1010790 – Final effluent composite sample
- P1010792 – Flow meter readout and containers used to collect samples for analysis of adsorbable organic halides
- P1010793 – Sample log book
- P1010794 – Southeasterly view of the aerated stabilization basin
- P1010796 – Composite sample collected from the inlet to the mix basin
- P1010797 – Composite sample collected from the inlet to the mix basin
- P1010799 – Laboratory sample logs
- P1010800 – Laboratory bench sheets
- P1010802 – Sample bottle preparation and shipment log
- P1010803 – Oven used for non-regulatory laboratory analysis
- P1010804 – Oven used for TSS analysis
- P1010805 – View inside the oven used for TSS analysis
- P1010806 – TSS log
- P1010808 – Easterly view of bank erosion near decommissioned stormwater outfall 007
- P1010809 – Southerly view of the dry well that replaced stormwater outfall 007
- P1010810 – Westerly view of wetland located west of stormwater outfall 007
- P1010811 – Sample preparation at sampling point 021B, which represents process wastewater from the bleach plant's alkaline bleaching stage
- P1010812 – Sample collection at sampling point 021A, which represents process wastewater from the bleach plant's acid bleaching stage
- P1010813 – Temperature measurement at sampling point 021A, which represents process wastewater from the bleach plant's acid bleaching stage

ATTACHMENT C – CD of Electronic Files

Contents include:

- Original Photographs (Note: The camera was not set to local time during the inspection. Each electronic file reflects a time that is one hour later than the time that the photograph was taken.)
- Analytical Records
    - AOX – first week of May 2015
    - Chloroform – first week of May 2015
    - TCDD (EPA Method 1613) – May 2015
    - Bleach (EPA Method1653) – May 2015
    - Nutrients – May 2015
    - DMR Data Spreadsheet – 2015
- BMP Plan – May 2015
- QAP – June 2015
- Stormwater Pollution Prevention Plan – May 2015